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October 24th, 2022

Hon. Judge Vernon S. Broderick
Thurgood Marshall

United States Courthouse
40 Foley Square

New York, NY 10007

Re: Mouss Diarra v. City of New York (1:16-cv-07075).

Ref: Request for Permission to Show Journalist (Nick Pinto) copies of sealed victim photos in plaintiff counsel's possession

Dear Judge Broderick:

Plaintiff counsel requests to show Nick Pinto, a journalist with Hell Gate, copies in their possession, of photos of the victim in this matter consistent with the sealing order. The copies of photos will be shown privately to Mr. Pinto and are part of his investigation into this matter as a journalist and are not for publication but private viewing. As you know journalists prefer to independently verify assertions.

This Court has already allowed private viewing of these photos in the previous requests made. And this should not be construed as a request to unseal.

Mr. Pinto broke the story about Dara Weiss and is a highly regarded journalist in New York. See, <https://hellgatenyc.com/nypd-lawyer-forgery> The viewing will be via interactive zoom, essentially in-camera, between plaintiff counsel and Mr. Pinto only.

Public Interest:

The public has a vested interest¹ to know and follow this matter as this is a case adjudicated in open Court with grave Constitutional ramifications because City of New York deemed Mr. Diarra's arrest for "genital mutilation" as pursuant to a "policy of probable cause". The public has an invested right to know how this so-called "policy of probable cause" looks in real life situations.

In addition, the public has a vested right to know how New York Law department defends against Constitutional torts such as false arrests using taxpayers' money, and how discovery is conducted during litigation, considering the earlier article regarding Ms. Weiss's inappropriate litigation tactics (stonewalling, forgery, and delays). Also exemplified in the present matter *Diarra v. City of NY*.

Respectfully submitted,
/s/ Kissinger N. Sibanda
Kissinger N. Sibanda
Attorney for plaintiff
/KNS/

¹ As taxpayers and New York citizens.